

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

----- X  
CYNTHIA SAUNDERS, ROSE ANN H. GUERRIERI,  
FRANCINE B. PALMIERI, ROSEMARY ROMAN,  
JUNE WANDA MCMILLAN, LYDIA P. IRBY  
LINDA F. SANDERS, YOLANDA AYALA,  
CHEECHEE KUNG, LILLY CHU,  
HENRY KINSEY, DENISE A. GORDON  
VIRGINIA MARIE TEMPLE,

Plaintiffs,

v.

CITY OF NEW YORK and THE DEPARTMENT  
OF EDUCATION OF THE CITY OF NEW YORK

Defendants.

JUDGE SCHEINDLIN

07 CV 830

SAS

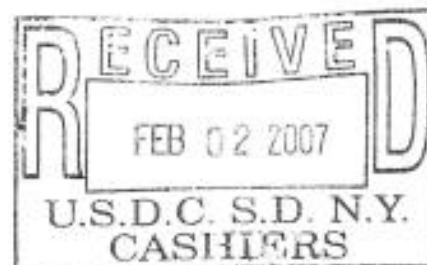
Civil Action No.

ECF CASE

(JURY TRIAL DEMANDED)

----- X  
COMPLAINT

INTRODUCTION



Plaintiffs, by and through their counsel, the Office of the General Counsel of District Council 37, AFSCME, AFL-CIO, file this complaint against the City of New York ("New York City") and the New York City Department of Education ("DOE")(hereinafter collectively referred to as "defendants") and state as follows:

PRELIMINARY STATEMENT

1. Plaintiffs are Parent Coordinators or Parent Support Officers employed in the New York City public schools who since on or about August 23, 2003 have worked more than 40 hours in a work week but have not been paid time and one-half in cash for the hours they have

worked in violation of § 7 (a)(2)(A) of the Fair Labor Standards Act, (FLSA), 20 U.S.C. § 207 (a)(2)(A), notwithstanding DOE's knowledge and public acknowledgment that these employees were covered by the FLSA and entitled to be paid in cash at the rate of time and one-half for the hours worked in excess of 40 in a work week.

2. Plaintiffs also bring this action in their representative capacity pursuant to 29 U.S.C. § 216 (b) on behalf of approximately 1450 current and former Parent Coordinators and Parent Support Officers employed by the DOE since on or about August 23, 2003 who are similarly situated in that they have also worked in excess of 40 hours in a work week and have not been paid in cash at the rate of time and one-half for those hours worked.

3. Plaintiffs intend to move this Court for an Order to provide all current and former Parent Coordinators or Parent Support Officers with notice of this litigation and an opportunity to file a consent to "opt-in" as a plaintiff in this lawsuit and obtain payment including liquidated damages, interest and attorney fees where warranted for hours worked in excess of 40 that were not compensated in accordance with the FLSA.

4. Plaintiffs seek compensation for their overtime, liquidated damages, interest, and attorney fees and costs of this litigation, and for such relief as this Court deems reasonable and just.

5. Beginning on or about August 23, 2003 and continuing to the present, DOE officials have knowingly and willfully refused and failed to pay the plaintiffs and other Parent Coordinators and Parent Support Officers in cash at the rate of time and one-half for hours worked in excess of 40 in a work week.

6. During that same period the DOE has failed and refused to properly post official U.S. Department of Labor Notices informing employees of their right to be paid in cash at the rate of time and one-half for hours worked over 40 in a work week.

7. At all times material herein, various DOE agents including managerial and payroll officials misinformed plaintiffs that they were not entitled to be paid for overtime worked in excess of 40 in a work week, that the DOE had no payroll code by which such overtime could be paid, that there was no money budgeted to pay for overtime worked, or that enforcement of their right to time and one-half pay would result in a cut in educational services for children.

#### **JURISDICTION AND VENUE**

8. This Court has jurisdiction over this action pursuant to 28 U.S.C. §1331, 1337 and 29 U.S.C. §216 (b).

9. This Court is empowered to issue a declaratory judgment pursuant to 28 U.S.C. §§ 2201 and 2202.

10. Venue is proper in this district pursuant to 28 U.S.C. §1391.

#### **PARTIES**

11. Plaintiffs are or have at all times material herein been employed by defendants as a Parent Coordinator or Parent Support Officer in the New York City school system by the defendants. Plaintiffs bring this action in their individual and representative capacity for a declaratory judgment, back pay, liquidated damages, interest, attorney fees, costs and other relief pursuant to 29 U.S.C. §207, 29 U.S.C. §216(b), and 28 U.S.C. §1331 to remedy the defendants' willful and unlawful violations of the overtime provisions of the FLSA complained of herein.

12. Plaintiffs are identified in the caption of the Complaint and have given their written consent to be party plaintiffs in this action pursuant to 29 U.S.C. § 216(b). Such written

consents are appended to this Complaint in the Appendix. These written consent forms set forth each plaintiff's name and address.

13. Each of the plaintiffs in this action while employed by defendants in the position of Parent Coordinator or Parent Support Officer has been an "employee" within the meaning of the FLSA, 29 U.S. C. Section 203(c)(2)(C).

14. Defendant New York City is, among the other things, an entity amenable to suit under the FLSA in that it is, and was at all times material hereto, a public agency within the meaning of Sections 3(d) and (x) of the FLSA, 29 U.S. C. §203 (d) and (x). New York City has a principal office and place of business located at City Hall, New York, New York 10007 and may be served with process by serving the Office of Corporation Counsel, 100 Church Street, New York, New York, 10007.

15. Defendant DOE is an administrative division of the City of New York, a body established pursuant to New York State Education Law §§2590-b and 2590-g and is, among other things, an entity amenable to suit under the FLSA in that it is, and was at all times material herein, a public agency within the meaning of Sections 3 (d) and (x) of the FLSA, 29 U.S.C. §203 (d) and (x). DOE's principal office is located at the Tweed Courthouse, 52 Chambers Street, New York, New York 10007, and may be served with process by serving the Office of the General Counsel of the DOE, 52 Chambers Street, New York, New York, 10007 and the Office of the Corporation Counsel for the City of New York, 100 Church Street, New York, New York, 10007.

#### **FACTS**

16. On or about August 23, 2003 the DOE hired or rehired approximately 1450 employees in the newly created in-house title of Parent Coordinator and approximately 50



employees in the newly created in-house title of Parent Support Officer as part of the reorganization of the DOE. Parent Coordinators are full-time, school based employees whose primary responsibilities are to be parent advocates and work closely with principals and teachers to address parent concerns or obtain information about school instruction, transportation, registration, safety, security, facilities or other school matters. Parent Support Officers are full-time employees who work in one of 10 Regional Parent Support Offices at Learning Centers within the five boroughs of the City of New York. Responsibilities of Parent Support Officers include managing the workload of the Parent Support Office and working closely with Parent Coordinators and other DOE employees to support parent outreach and engagement efforts at the school level and assist with parent inquiries and concerns. Employees in the Parent Coordinator and Parent Support Officer titles full-time employees scheduled to work seven and one-half (7.5) hours per day, 35 hours per week.

17. Since on or about August 23, 2003 and continuing to date, the plaintiffs have been employed by defendants in the position of Parent Coordinator or Parent Support Officer.

18. Since on or about August 23, 2003 and continuing to date, the plaintiffs have regularly and consistently worked beyond their scheduled 35 hour shifts and have worked in excess of 40 hours in a work week with the knowledge, consent and approval of the defendants and their agents.

19. At all times material herein, the defendants and persons acting as their agents knew that plaintiffs were covered by the overtime provisions of the FLSA, were entitled to be paid in cash at the rate of time and one-half for hours worked over 40 in a work week and that the failure to pay plaintiffs in cash at the rate of time and one-half was a violation of the FLSA.

20. Defendants willfully and knowingly failed or refused to pay Parent Coordinators and Parent Support Officers compensatory time for hours worked between 35 and 40 in a work week or in cash at the rate of time and one-half when they worked in excess of 40 hours in a work week. When plaintiffs worked in excess of 40 hours defendants either failed to pay plaintiffs at all or paid them in compensatory time at their straight time rate of pay.

21. At all times material herein, defendants willfully and knowingly failed or refused to post official U.S. Department of Labor notices in locations where Parent Coordinators and Parent Support Officers worked in violation of 29 C.F.R § 516.4 thereby depriving employees of their right to be paid time and one-half in cash for overtime hours worked in the work week.

22. At all times material herein since on or about August 23, 2003, the defendants and persons acting as their agents knowingly misinformed and misled Parent Coordinators and Parent Support Officers about their right to receive compensatory time for hours worked in excess of their 35 hour schedules or cash payments for hours worked in excess of 40 hours in a work week. For example, DOE officials told some Parent Coordinators and Parent Support Officers that they could not receive cash compensation for hours worked in excess of 40 in a work week because DOE had no money budgeted for overtime for Parent Coordinators or Parent Support Officers. Defendants told other plaintiffs that cash payments for overtime could only be paid from their principal's budget and would adversely impact on the delivery of educational services to the children of the City of New York.

23. As a result of foregoing actions of the defendants, plaintiffs have been misled and/or actively discouraged from bringing this action within three years from defendants' first violation of the FLSA's overtime provisions and a number of plaintiffs' claims for cash

compensation and liquidated damages may be beyond the three year statute of limitations for willful violations of the FLSA.

24. In August 2006, plaintiff Cynthia Saunders notified DOE through counsel that she had been denied pay at the rate of time and one-half for 218.5 hours worked in excess of 40 in a work week since her appointment as a Parent Coordinator on August 28, 2003 and provided documentation to support her claim.

25. On or about November 15, 2006, the DOE agreed to pay plaintiff Saunders for the overtime she worked at the rate of time and one-half, but did not agree to pay liquidated damages, interest or attorney fees and insisted that she commence an action in court as a condition for settlement of her claim.

26. Notwithstanding defendants' representations to pay Cynthia Saunders and other plaintiffs in cash for past overtime worked, defendants continue to violate the overtime provisions of the FLSA and continue to refuse to pay Parent Coordinators and Parent Support Officers in cash at the rate of time and one-half for hours worked in excess of 40 in a work week.

27. Section 207 of the FLSA requires the payment of overtime compensation to employees who work in excess of the hourly standards set forth therein. In particular, Section 207(a) requires the payment of overtime compensation at the rate of one and one-half times each employee's regular rate of pay for all work hours in excess of forty hours per week. Section 207(o) of the FLSA permits the limited use of compensatory time off as a substitute for cash compensation for overtime pay for public sector employees, but only under the terms and conditions prescribed by the FLSA, 29 U.S.C. §207(o), not applicable here.

28. At all times material herein, when plaintiffs have worked in excess of 40 hours in a week, defendants failed to provide plaintiffs with the rights and protections provided under the



FLSA. Among other things, defendants have violated the FLSA, 29 U.S.C. §§207(a) and (o) through such actions as (1) suffering or permitting plaintiffs to work before and after their scheduled shifts or through their lunch periods without compensation for such work activities; (2) failing to pay plaintiffs overtime compensation in cash at the rate of time and one-half for hours worked in excess of 40 hours in a work week, failing to pay for hours worked between 35 and 40 in a work week or to provide compensatory time for such work; (4) converting compensatory time to sick leave after 90 days in violation of the protections of the FLSA; and (5) refusing to allow plaintiffs to use compensatory time when requested.

29. As a result of the defendants' willful and purposeful violations of the FLSA, there has become due and owing to the plaintiffs an amount that has not yet been precisely determined. Although a number of plaintiffs have records of the hours worked since their appointment, others do not have complete copies of their work histories. The official employment and work records for the plaintiffs are in the exclusive possession, custody and control of defendants and the plaintiffs are unable to state at this time the exact amount owing to them. Defendants are under a duty under the FLSA, 29 U.S.C. §211(c), and various other statutory and regulatory provisions to maintain and preserve payroll and other employment records with respect to the plaintiffs from which the amount of defendants' liability can be ascertained.

30. Pursuant to 29 U.S.C. §216(b), plaintiffs are entitled to recover liquidated damages in an amount equal to their back pay damages for the defendants' failure to pay overtime compensation. In addition, plaintiffs are entitled to an award of interest on their back pay damages until such damages are paid.

31. Plaintiffs are entitled to recover attorney's fees and costs under 29 U.S.C. §216(b).



**CLAIMS FOR RELIEF FOR  
VIOLATIONS OF THE FAIR LABOR STANDARDS ACT**

**FIRST CAUSE OF ACTION**

32. Plaintiffs hereby incorporate by reference paragraphs 1 through 31 of this complaint and repeat the allegations set forth herein.

33. Defendants have knowingly suffered or permitted plaintiffs to work before and after their scheduled shifts or through their lunch periods and have willfully failed and refused to pay plaintiffs in cash at the rate of time and one-half for hours worked in excess of 40 in a work week in violation of 29 U.S.C. § 207.

**SECOND CAUSE OF ACTION**

34. Plaintiffs hereby incorporate by reference paragraphs 1 through 31 of this complaint and repeat the allegations set forth herein.

35. Defendants have willfully failed and refused to pay plaintiffs compensatory time for hours worked between 35 and 40 in a work week in excess of their scheduled shifts in violation of 29 U.S.C. § 207.

**THIRD CAUSE OF ACTION**

36. Plaintiffs hereby incorporate by reference paragraphs 1 through 31 of this complaint and repeat the allegations set forth herein.

37. Defendants have converted plaintiffs' compensatory time to sick leave after 90 days or prevented plaintiffs from utilizing their compensatory time in violation of the protections of 29 U.S.C. § 207.

**FOURTH CAUSE OF ACTION**

38. Plaintiffs hereby incorporate by reference paragraphs 1 through 31 of this complaint and repeat the allegations set forth herein.

39. By failing to post official notices of employee rights to be paid in cash for overtime hours worked over 40 in a work week and by misinforming and actively discouraging Parent Coordinators and Parent Support Officers from exercising their rights to receive cash at the rate of time and one-half for hours worked over 40 defendants have acted in knowing disregard of plaintiffs' rights and have willfully interfered with and prevented plaintiffs from timely filing their claims within a three year period from commencement of the FLSA violations enumerated above.

**DEMAND FOR A JURY TRIAL**

40. Pursuant to Rule 38 of the Federal Rules of Civil Service Procedure, plaintiffs hereby demand that their claims be tried before a jury.

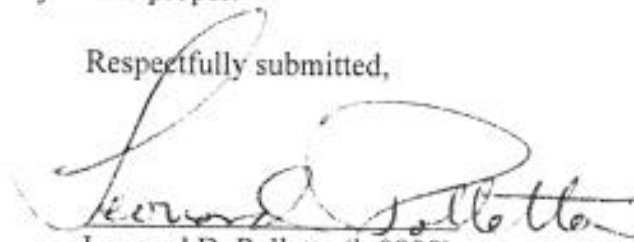
WHEREFORE, the plaintiffs, on their own behalf and on behalf of others similarly situated, pray that this Court:

- (a) Enter judgment declaring that the defendants have willfully and wrongfully violated their statutory obligations, and deprived each of the plaintiffs of his and her rights;
- (b) Order a complete and accurate accounting of all the compensation to which the plaintiffs are entitled;
- (c) Award plaintiffs monetary liquidated damages equal to their unpaid compensation;
- (d) Award plaintiffs interest on their unpaid compensation;

(e) Award plaintiffs their reasonable attorneys fees to be paid by the defendants, and the costs and disbursements of this action; and

(f) Grant such other relief as may be just and proper.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Leonard D. Polletta". The signature is fluid and cursive, with the first name "Leonard" written in a larger, more prominent script than the last name "Polletta".

Leonard D. Polletta (lp0900)  
Of Counsel  
Office of Eddie M. Demmings  
General Counsel  
District Council 37,  
AFSCME, AFL-CIO  
125 Barclay Street – Rm. 510  
New York, NY 10007  
(212) 815-1450

Michael Best, Esq.  
General Counsel  
New York City Department of Education  
Tweed Courthouse  
52 Chambers Street  
New York, New York 10013  
(212) 374-6888

Michael A. Cardozo, Esq.  
New York City Corporation Counsel  
New York City Law Department  
100 Church Street, 4<sup>th</sup> Floor  
New York, New York 10007  
(212) 788-0303

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REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

I am (or was) employed by the New York City Department of Education (City of New York) for some or all of the period after June 3, 2003 as a parent coordinator or parent support officer. I request to be a plaintiff in a court action brought on my behalf and on behalf of other current and former parent coordinators and parent support officers against the City of New York. My claims include the failure of the City of New York to pay me overtime compensation in accordance with the Fair Labor Standards Act (FLSA) while I have been a parent coordinator or parent support officer. This case does not involve claims for overtime when working in other positions. I understand that the out-of-pocket costs (travel costs, transcript costs, copying, etc.) of this litigation are being paid by the District Council 37 (Union), whereas I am assisting in the payment of legal fees pursuant to a contingent fee.

In accordance with the confidential Retainer Agreement, I am requesting to retain the Office of the General Counsel of District Council 37, AFSCME, AFL-CIO (General Counsel), 125 Barclay Street, New York, NY 10007, and, upon notification, such other law firms whom they deem appropriate to assist in representing me in the case. I authorize the General Counsel to represent me concerning my claims, including back wages, liquidated damages, interest, attorney's fees and costs, in a court case against the City of New York, New York. Upon agreeing to represent me, the General Counsel may file this consent in federal court or other forum and take all actions they deem necessary or appropriate in that proceeding, including the settlement and collection of any and all of my claims. I understand that there will be other current and former parent coordinators and parent support officers participating in this action and I will respect the decision of the majority of plaintiffs in any settlement of the court action. I understand that the law provides that I cannot be retaliated against or in any way penalized because of my participation in this case.

**I UNDERSTAND THAT THE GENERAL COUNSEL IS NOT MY ATTORNEY IN THIS CASE  
UNTIL A RETAINER AGREEMENT HAS BEEN EXECUTED.**

**CONSENT TO SUE****REQUEST TO BECOME PARTY-PLAINTIFF - PARENT COORDINATORS AND PARENT  
SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME SAUNDERS CYNTHIA  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]  
JAMAICA New York 11434  
City State Zip Code

SIGNATURE Cynthia Saunders

DATE 1/16/07

LDP/sa consenttosue

REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

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SUPPORT OFFICER - OVERTIME PAY**

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NAME GUERRIERI ROSE ANN H.  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]  
New York NY 10025  
City State Zip Code

SIGNATURE [Signature]

DATE 1/14/07



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OF THE DEPARTMENT OF EDUCATION**

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SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Palmieri Francine B.  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Brooklyn NY 10961  
City State Zip Code

SIGNATURE Francine B. Palmieri

DATE 1-12-07



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
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NAME Roman Rosemary  
Last Name First Middle

SOCIAL SECURITY NUMBER 

HOME ADDRESS   
Brooklyn NY 11218  
City State Zip Code

SIGNATURE Rosemary Roman

DATE 1/16/07

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NAME McMillan June Wanda  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]  
Bronx NY 10452  
City State Zip Code

SIGNATURE June W. McMillan  
DATE 1/15/07



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
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NAME IRBY LYDIA P  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS MAHOG Virginia Beach VA 23462  
City State Zip Code

SIGNATURE [Signature] 11207

DATE 1/10/07

LDP/ia.consenttosue



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

I am (or was) employed by the New York City Department of Education (City of New York) for some or all of the period after June 3, 2003 as a parent coordinator or parent support officer. I request to be a plaintiff in a court action brought on my behalf and on behalf of other current and former parent coordinators and parent support officers against the City of New York. My claims include the failure of the City of New York to pay me overtime compensation in accordance with the Fair Labor Standards Act (FLSA) while I have been a parent coordinator or parent support officer. This case does not involve claims for overtime when working in other positions. I understand that the out-of-pocket costs (travel costs, transcript costs, copying, etc.) of this litigation are being paid by the District Council 37 (Union), whereas I am assisting in the payment of legal fees pursuant to a contingent fee.

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**I UNDERSTAND THAT THE GENERAL COUNSEL IS NOT MY ATTORNEY IN THIS CASE  
UNTIL A RETAINER AGREEMENT HAS BEEN EXECUTED.**

**CONSENT TO SUE****REQUEST TO BECOME PARTY-PLAINTIFF – PARENT COORDINATORS AND PARENT  
SUPPORT OFFICER – OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Sanders Linda   
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Brooklyn NY 11235  
City State Zip Code

SIGNATURE [Signature]

DATE 1/11/07

REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

I am (or was) employed by the New York City Department of Education (City of New York) for some or all of the period after June 3, 2003 as a parent coordinator or parent support officer. I request to be a plaintiff in a court action brought on my behalf and on behalf of other current and former parent coordinators and parent support officers against the City of New York. My claims include the failure of the City of New York to pay me overtime compensation in accordance with the Fair Labor Standards Act (FLSA) while I have been a parent coordinator or parent support officer. This case does not involve claims for overtime when working in other positions. I understand that the out-of-pocket costs (travel costs, transcript costs, copying, etc.) of this litigation are being paid by the District Council 37 (Union), whereas I am assisting in the payment of legal fees pursuant to a contingent fee.

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**CONSENT TO SUE****REQUEST TO BECOME PARTY-PLAINTIFF - PARENT COORDINATORS AND PARENT  
SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Ayala Yolanda  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Chesnut Ridge NY 10927  
City State Zip Code

SIGNATURE [Signature]

DATE 7/14/2007

LDP/ia consenttosue

07 JAN 22 AM 10:58

DIST. COUNCIL 37  
LEGAL DEPT.



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

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**CONSENT TO SUE****REQUEST TO BECOME PARTY-PLAINTIFF - PARENT COORDINATORS AND PARENT  
SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Kung Cheech   
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Brooklyn NY 11219  
City State Zip Code

SIGNATURE Cheech Kung

DATE Jan. 12 2007



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

I am (or was) employed by the New York City Department of Education (City of New York) for some or all of the period after June 3, 2003 as a parent coordinator or parent support officer. I request to be a plaintiff in a court action brought on my behalf and on behalf of other current and former parent coordinators and parent support officers against the City of New York. My claims include the failure of the City of New York to pay me overtime compensation in accordance with the Fair Labor Standards Act (FLSA) while I have been a parent coordinator or parent support officer. This case does not involve claims for overtime when working in other positions. I understand that the out-of-pocket costs (travel costs, transcript costs, copying, etc.) of this litigation are being paid by the District Council 37 (Union), whereas I am assisting in the payment of legal fees pursuant to a contingent fee.

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SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Chen Lilly \_\_\_\_\_  
                     Last Name                      First                      Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Greenv Meadows NY 10665  
                     City                      State                      Zip Code

SIGNATURE Lilly Chen

DATE January 12, 2007

LDP is consent to sue

REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

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SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME Kinsey Henry  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]

Brooklyn NY 11201  
City State Zip Code

SIGNATURE Henry Kinsey

DATE 1/12/07



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

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SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME GORDON DENISE A.  
Last Name First Middle

SOCIAL SECURITY NUMBER 

HOME ADDRESS 

BROOKLYN NY 11216  
City State Zip Code

SIGNATURE Denise A. Gordon

DATE January 23, 2007

EDP/ia consentto sue

07 JAN 29 PM 2:36

DISCLOSURE



REQUEST TO BECOME PARTY PLAINTIFF**FLSA OVERTIME PAY FOR PARENT COORDINATORS AND PARENT SUPPORT OFFICERS  
OF THE DEPARTMENT OF EDUCATION**

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SUPPORT OFFICER - OVERTIME PAY**

I hereby consent to become a party plaintiff in an action to recover overtime wages and other relief under the Fair Labor Standards Act.

NAME TEMPLE VIRGINIA MARIE  
Last Name First Middle

SOCIAL SECURITY NUMBER [REDACTED]

HOME ADDRESS [REDACTED]  
BAYSIDE NY 11364  
City State Zip Code

SIGNATURE Virginia M Temple

DATE 1/12/07